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ILLINOIS LICENSED BEVERAGE ASSN

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Comment 135

Chief, Regulations & Procedures Division
Alcohol & Tobacco Tax & Trade Bureau
ATTN: Notice No. 41
P.O. Box 14412
Washington DC 20044-4412

Dear Chief:

I am writing to respectfully request your office issue a regulation that permits meaningful consumer-oriented Serving Facts on beer, wine and spirits labels; and to allow manufacturers to provide this labeling information in the interim during the rule-making process so consumers can make informed decisions when consuming beverage alcohol.

The Illinois Licensed Beverage Association is a not-for-profit business trade association comprised of over 2,600 Illinois-based retailers of beverage alcohol. The consuming public often asks our business members and their employees for this information. Unfortunately, due to current labeling restrictions, we are unable to provide this information to our customers.

Today's consumer is health conscious and responsibility oriented about beverage alcohol consumption. Providing a means for suppliers to include this information on their labels will provide a real benefit for the public and will assist our industry in our efforts to promote responsible consumption.

Current federal alcohol beverage label regulations do not allow most beer, wine and distilled spirits companies to provide information about their products so that consumers can make informed choices about what to drink and how much to drink.

Food, soft drinks, over-the-counter drugs, and even dietary supplements provide consumers with basic consumer information on the label. Alcohol beverages (with some exceptions) are the only major class of consumable goods that do not provide this type of information on the label. I urge TTB to allow labels to voluntarily list information such as serving size and servings per container, as well as alcohol, calories, fat, carbohydrates and protein per serving.

Of all this information, the amount of alcohol per serving would be highly beneficial for consumers to have.

Allowing placement of information on alcohol per serving and servings per container on beer, wine and distilled spirits labels will help consumers to better understand government's advice on responsible consumption and dietary guidelines.

Consumer Serving Facts will be more meaningful if TTB makes clear in this rulemaking what constitutes a "serving." This is the essential fact that will allow consumers to make more informed decisions on consuming beverage alcohol products.

The standard serving definition used in the *Dietary Guidelines* (12 ounces of regular beer, 5 ounces of table wine and 1.5 ounces of 80 proof distilled spirits) is one widely used by U.S. government agencies, public health groups, consumer groups, and a majority of state driver's license manuals. It makes sense to use the same definition as the benchmark for labels.

I urge TTB to act expeditiously to promulgate a regulation that permits meaningful consumer-oriented Serving Facts on beer, wine and spirits labels, and to allow manufacturers to provide this information on labels during the rulemaking process.

I will be speaking with Illinois legislators to urge them to contact your office in support of this measure as well.

Thank you for your time and consideration of this request. Please contact me at your convenience if I can be of further assistance.

Sincerely



Steve Riedl, Executive Director
Illinois Licensed Beverage Association

Cc Illinois Licensed Beverage Association Executive Board